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BEFORE THE

JUN 1 9 2003

Federal Communications Commission

WASHINGTON, D. C. 20554

FEDERAL COMMUNICATIONS COMMISSION

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In the Matter of)	
)	
Amendment of Section 73.202(b))	MM Docket No. 02-12
Table of Allotments,)	RM-10356
FM Broadcast Stations,)	RM-10551*
(Ash Fork, Chino Valley, Dolan Springs,)	RM-10552*
Fredonia, Gilbert, Lake Montezuma, Payson,)	RM-10553*
Peach Springs, Seligman, and Tusayan, Arizona;)	RM-10554*
Moapa Valley, Nevada; and Beaver and Cedar)	
City, Utah))	

To: Assistant Chief, Audio Division

RESPONSE TO ORDER TO SHOW CAUSE

Route 66 Broadcasting, L.L.C. ("Route 66"), licensee of Station KZKE(FM), Channel 277A, Seligman, Arizona, herein responds to the Order to Show Cause (hereinafter "Order"), released in the above-captioned proceeding on May 5, 2003 (DA 03-1476) (hereinafter "Order"). In response to the Order, the following in shown:

In the above-captioned proceeding (hereinafter the "Ash Fork proceeding"), NPR Phoenix, LLC ("NPR") and Spectrum Scan, LLC request the substitution of Channel 227A for Channel 277A at Seligman, Arizona, and the modification of Station KZKE's license accordingly. The substitution is requested in order to accommodate NPR's allotment plan. NPR has agreed to reimburse Route 66 for the reasonable costs incurred in connection with the change of KZKE's channel.

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C/RBM DOCUMENTS/MHM/125/PLEADINGS/RESPONSE TO ORDER TO SHOW CAUSE.JMR.wpd

Route 66 notes, however, that another proposal to change KZKE's frequency is also pending. In MMB Docket 02-124 (hereinafter the "Amboy proceeding"), it is proposed that Channel 234C2 be substituted for Channel 277A at Seligman and that KZKE's license be modified accordingly. The allotment of Channel 234C2 at Seligman is presented in the counterproposal of Cameron Broadcasting, Inc. filed July 15, 2002 in the Amboy Proceeding. The allotment of Channel 234C2 at Seligman is dependent upon another allotment change advanced in Cameron Broadcasting's counterproposal, *i.e.* relocation of Station KFLG(FM), Channel 234C, Kingman, Arizona, to Pahrump, Nevada.

Obviously changing an existing station's frequency is disruptive to the listening audience. The Commission usually determines that disruption is offset by the benefits accruing to the public from adoption of an allotment proposal. But here, KZKE faces the prospect of changing its frequency twice in short order – first to Channel 227A and then to Channel 234C2. The disruptions that would result are not only detrimental to the public but to Route 66 as well. It will be difficult enough for Route 66 to inform and entice its listeners to tune in KZKE on 94.7 mHz (Channel 234) instead of 103.3 mHz (Channel 277). For Route 66 to have to convince those listeners, as an interim measure, to tune in KZKE on 93.3 mHz (Channel 227) and then, possibly only weeks later, to tune in the station on its ultimate frequency, 94.7 mHz, is an unreasonable burden under the circumstances.

¹ The proposal contemplates use of a special reference point for Station KZKE (NL 35-17-37, WL 112-52-33).

Accordingly, Route 66 urges the Commission to consolidate Docket Nos. 02-12 and 02-124 so that in one proceeding the Commission can determine the ultimate frequency to which KZKE will be moved.

ROUTE 66 BROADCASTING, L.L.C.

Matthew H. McCormick

Its Counsel

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June 19, 2003

CERTIFICATE OF SERVICE

I, Janice M. Rosnick, do hereby certify that I have on this 19th day of June, 2003, caused to be hand delivered or mailed via First Class mail, postage prepaid, copies of the foregoing RESPONSE TO ORDER TO SHOW CAUSE:

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